

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Constance Pietrzak,)	
)	
Plaintiff,)	Case No. 1:23-cv-15227
)	
v.)	
)	Judge Matthew F. Kennelly
)	
Advocate Health and Hospitals)	
Corporation d/b/a Advocate Medical)	
Group,)	
)	
Defendant.		

STIPULATION OF DISMISSAL

Plaintiff Constance Pietrzak (“Plaintiff” or “Pietrzak”) and Defendant Advocate Health and Hospitals Corporation d/b/a Advocate Medical Group (“Defendant” or “Advocate”), by and through their undersigned counsel and pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), hereby agree that all issues and controversies in this case have been resolved to their mutual satisfaction. The Parties request the Court to retain jurisdiction to enforce the terms of their settlement agreement (the “Agreement”) under the authority of *Kokkonen v. Guardian Life Insurance Company of America*, 511 U.S. 375, 381-82 (1994).

IT IS HEREBY ORDERED:

1. The Parties shall comply with the Settlement Agreement they will finalize and execute. The Parties expressly waive their rights under Federal Rule of Civil Procedure 65(d) to the extent Rule 65(d) requires this order to be specific in terms or to describe in reasonable detail and without reference to the Agreement or the act or acts to be restrained.
2. By consent of the Parties, the Court shall retain jurisdiction for the purpose of enforcing the terms of the Agreement.

3. This case is dismissed without prejudice with leave to reinstate on or before November 21, 2025, for the purpose of enforcing the settlement. This Agreed Order of Dismissal is entered without prejudice in order to allow the Court to enforce the Agreement. The Parties are barred from relitigating any claims raised in this litigation or any claims released by means of the Agreement.

4. In the event a motion to reinstate or motion to enforce settlement is not filed on or before November 21, 2025, the Court shall relinquish jurisdiction and the case shall be deemed dismissed with prejudice without further order of the Court. Each Party shall bear its own attorney's fees and costs.

Constance Pietrzak

Advocate Health and Hospitals Corporation
d/b/a Advocate Medical Group

Plaintiff

Defendant

By: s/ Joseph E. Urani
One of her Attorneys

By: s/Jill S. Vorobiev
One of its Attorneys

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